

DECLARATION OF RANDY L. PRITCHETT

I, Randy L. Pritchett, hereby submit the following Declaration, under penalty perjury, based upon my personal knowledge of the following facts:

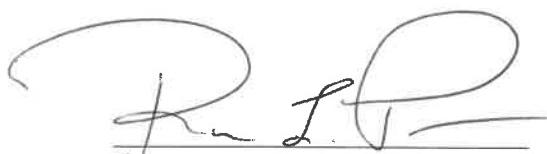
1. My name is Randy Pritchett. I am employed by Cuyahoga County as a Correction Officer at the Cuyahoga County Corrections Center (“CCCC”). I have been employed as a Correction Officer since April of 1998.
2. Over the more than two decades of time I have served as a Correction Officer, I have attended formal trainings in: Correction Officer Basic 120 Hour Training; Use of Force, Body Searches - Clothed and Unclothed; Report Writing; CPR; Basic Security Duties; Sexual Harassment and Abuse in Corrections; First Aid; Suicide Prevention - Detection, Interventions and Response; Fire Safety; Inmate Abnormal Behavior - the Officer’s Responsibility; Inmate Supervision - the Role of the Correction Officer Fights, Riots and Disorders; Corrections Officer Safety and Liability Awareness; Creating and Maintaining a Positive Work Environment through the National Institute of Corrections. See Exhibit 1, which are my formal training records kept by Cuyahoga County.
3. My primary responsibilities involve maintaining security of the jail, ensuring inmate safety, proactively engaging with inmates to reduce the incidences of fighting and

other disturbances amount the inmate population, observing and influencing inmate behavior, conducting inspections for contraband, weapons and facility damage and ensuring Correction Officers follow all policies and procedures of the CCCC.

4. On December 10, 2018, I was on duty as a Corporal, serving as a first-line supervisor of the Correction Officers, within the CCCC.
5. While on duty on December 10, 2018, I responded to an altercation between Inmate Fatima Suleiman and Inmate Tabitha Jackson. When I arrived at the scene of the incident, Correction Officers Kimberly Brown-Wiggins and Nancy Muszynec had separated both inmates. See Exhibit 2 and Exhibit 3, which are Combination reports prepared by Officers Muszynec and Brown-Wiggin. As the Corporal who responded to the situation, I signed the reports as the supervisor on duty and the supervisor who ensured that both inmates were seen by medical following an incident, consistent with procedures involving assaults between inmates.
6. After the threat of further violence was neutralized, inmate Jackson was seen in medical, where Nurse Zitello checked her vitals and completed a physical examination. Inmate Jackson was cleared to returned to her housing unit. See Exhibit 1. I did not observe any injuries on inmate Jackson.
7. Inmate Fatima Suleiman was also seen in medical. See Exhibit 1. Upon medical's examination of Inmate Suleiman, it was determined that Inmate Suleiman's injuries required treatment at Metrohealth systems. See Exhibit 1. Inmate Suleiman was transported to Metrohealth system by EMS.

8. I am aware of the Plaintiff in the *Jackson* case allegations against me regarding the incident that occurred on December 10, 2018 within the Cuyahoga County Correction Center.
9. I did not slam Inmate Jackson into a desk. I did not use unreasonable or excessive force against Inmate Jackson.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this 23rd day of January, 2023.



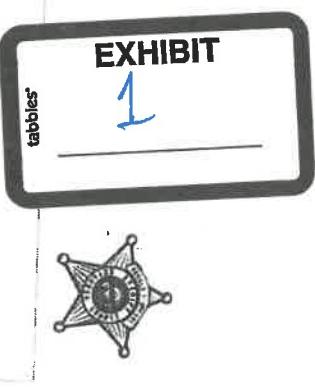
RANDY L. PRITCHETT

Cuyahoga County Sheriff's Office Correction Center Training Report

Employee Name: Pritchett, Randy

Joint Owner: Emp Name, Training Start, Training Type

<u>Inmate Abnormal Behavior: The Officer's Responsibility</u>	<u>Employee Name</u>	<u>Training Date</u>	<u>Hours</u>	<u>Instructor</u>
<u>Interpersonal Communications</u>	Pritchett, Randy	7/8/2008	1.5	corrections article-mental health
<u>Subject Control Techniques</u>	Pritchett, Randy	7/22/2008	1.5	Wervey/McArthur
<u>Inmate Supervision: The Role of the Correction Officer</u>	SRT physical training	8/5/2008	1.5	Ivey
<u>Fights, Riots and Disorders</u>	<i>Emergency Restraint Chair</i>			
<u>Body Searches: Clothed and Unclothed</u>	Pritchett, Randy	8/19/2008	1	corrections article-gangs
<u>Subject Control Techniques</u>	Pritchett, Randy	11/30/2008	0.5	Schwartz
<u>Report Writing</u>	<i>Cell Extraction Training</i>			
<u>Subject Control Techniques</u>	Pritchett, Randy	12/7/2008	0.5	Schwartz
<u>CPR</u>	Pritchett, Randy	12/21/2008	0.75	Schwartz
<u>Subject Control Techniques</u>	Pritchett, Randy	1/4/2009	0.5	Schwartz
<u>Subject Control Techniques</u>	<i>SRT Physical Training</i>			
<u>Subject Control Techniques</u>	Pritchett, Randy	1/13/2009	1	Schwartz
<u>Subject Control Techniques</u>	Pritchett, Randy	3/9/2009	1.5	Matejka
<u>Subject Control Techniques</u>	calisthenics & cardio	3/16/2009	1	Schwartz
<u>Subject Control Techniques</u>	calisthenics, core work, running	3/17/2009	1.5	Schwartz
<u>Calisthenics, Stretching, 30 Minutes Running</u>	Pritchett, Randy	5/11/2009	1.25	Broeckel



Employee Name: Pritchett, Randy

Sort Order: Emp Name, Training Start, Training Type

Training Type

<u>Subject Control Techniques</u>	<u>Employee Name</u>	<u>Training Date</u>	<u>Hours</u>	<u>Instructor</u>	
Basic Security Duties	Pritchett, Randy	5/23/2013	1	J.Kelley	
cell and Living Area Searches	<i>Pepperball training</i>	Pritchett, Randy	7/18/2013	7	Kelley
subject Control Techniques	<i>SRT Cell extractions</i>	Pritchett, Randy	8/15/2013	6	J.Kelley
Sexual Harassment and Abuse in Corrections	<i>SRT Physical Training</i>	Pritchett, Randy	8/15/2013	1	J.Kelley
First Aid	<i>Pre</i>	Pritchett, Randy	11/12/2013	2	Dan Clark
Suicide Prevention: Detection, Interventions and Response	<i>ADMINISTRATION OF NALOXONE</i>	Pritchett, Randy	2/10/2015	1	E. METZ (Dawn Program)
Fire Safety	<i>Fire drills</i>	Pritchett, Randy	8/30/2015	1	On-Line Training CCJ
Interpersonal Communications	<i>Creating and Maintaining a Positive Work Environment</i>	Pritchett, Randy	3/13/2016	2.5	J.Kelley
Fire Safety	<i>Body Searches: Clothed and Unclothed</i>	Pritchett, Randy Louis	5/1/2016	1	National Institute of Correction
Subject Control Techniques	<i>Cross Gender Patdown</i>	Pritchett, Randy Louis	6/12/2016	1	Sgt. Toney
Training Overview and Orientation	<i>Restraint chair training</i>	Pritchett, Randy Louis	3/17/2018	0.6	D.Matejka
Interpersonal Communications	<i>Overtime Tracking</i>	Pritchett, Randy Louis	4/1/2018	Sean Potts	
	<i>Telephone Etiquette</i>	Pritchett, Randy Louis	12/4/2018	0.17	Sgt. Branch

Total Hours



This certificate recognizes that

RANDY PRITCHETT

has completed and passed the Restraint Training Test and is certified to operate the Safety Restraint Chair.

Certificate Valid Until:
12/9/2022

Agency Name: Cuyahoga County Sheriff Dept.
City / State: Cleveland / Ohio

Safety Restraint Chair Inc.
www.restraintchair.com





CUYAHOGA COUNTY
SHERIFF'S DEPARTMENT
-TRAINING DIVISION

CERTIFICATE OF TRAINING

This is to certify that

Randy Pritchett

Has successfully completed

**CORRECTIONS OFFICER SAFETY
& LIABILITY AWARENESS**

Instructors:

D. J. O'Connor

Sgt. Timothy O'Connor

Date: July 2, 2019

Print

Email

PDF



Certificate of Completion

RANDY PRITCHETT

has completed the online course

Creating and Maintaining a Positive Work Environment

Presented by the National Institute of Corrections

on May 1, 2016 with a score of 81%

Training hours: 1

Am Cosby, Director, NIC



Certificate of Completion

RANDY PRITCHETT

has completed the online course

Creating and Maintaining a Positive Work Environment

Presented by the National Institute of Corrections

on May 1, 2016 with a score of 81%

Training hours: 1

James E. Bly
Jim Cosby, Director, NIC

EMERGENCY CARE AND TRANSPORTATION OF AN INJURED PERSON**SRT SKILL DRILL 011-012**

Task: 1. Place a cervical collar on a patient

2. Place the patient on a long backboard.

3. Secure the patient and long backboard on a stretcher.

4. Ensure the stretcher is in a ready to move state.

Conditions: In a controlled environment and while given a cervical collar, long backboard, and stretcher correctly apply the C-collar, immobilize a patient to a long backboard, secure the long backboard with patient to a stretcher, and lift the stretcher.

Standards: Correctly apply the cervical collar, Properly immobilize a patient to a long board, properly secure the patient to a stretcher and ensure the stretcher is ready for movement.

SRT OFFICER: R. Pritchett

DATE: 01-11-16

Cervical Collar

NO.	Task Steps	Test Comments	Pass	Fail
1.	Apply in-line stabilization.	DISPLAYED UNDERSTANDING OF IN-LINE STABILIZATION TASK COMPLETED	✓	
2.	Measure the proper collar size.	TASK COMPLETED	✓	
3.	Place the chin support first.	APPROPRIATELY COMPLETED TASK	✓	
4.	Wrap the collar around the neck and secure the collar.	APPROPRIATELY COMPLETED TASK	✓	
5.	Ensure proper fit and maintain neutral, in-line stabilization.	TASK COMPLETED	✓	

EMERGENCY CARE AND TRANSPORTATION OF AN INMATE**SRT SKILL DRILL 011-012**

Task: 1. Place a cervical collar on a patient

2. Place the patient on a long backboard.
3. Secure the patient and long backboard on a stretcher.
4. Ensure the stretcher is in a ready to move state.

Conditions: In a controlled environment and while given a cervical collar, long backboard, and stretcher correctly apply the C-collar, immobilize a patient to a long backboard, secure the long backboard with patient to a stretcher, and lift the stretcher.

Standards: Correctly apply the cervical collar, Properly immobilize a patient to a long board, properly secure the patient to a stretcher and ensure the stretcher is ready for movement.

SRT OFFICER: R. PITT CNETT

DATE: 1-11-16

LONG BACKBOARD & STRETCHER

NO.	TASK	TEST COMMENTS	PASS	FAIL
1.	Rescuers kneel on one side of the patient and place hands on far side of the patient.	TASK COMPLETED	✓	
2.	On command, rescuers roll the patient towards themselves, quickly examine the back, slide the backboard under the patient, and roll the patient onto the backboard.	TASK APPROPRIATELY COMPLETED	✓	
3.	Center the patient on the board.	TASK COMPLETED	✓	
4.	Secure the upper torso first.	TASK COMPLETED	✓	
5.	Secure the chest, pelvis and upper legs.	TASK COMPLETED	✓	
6.	Begin to secure the patient's head by using a commercial immobilization device or rolled towels.	APPROPRIATELY COMPLETED TASK	✓	

EMERGENCY CARE AND TRANSPORTATION OF PATIENTSRT OFFICER: R. FRITCHETDATE: 1-11-16**CONTINUE LONG BACKBOARD & STRETCHER**

NO.	TASK	TEST COMMENTS	PASS	FAIL
7.	If needed place tape across the patient's forehead	TASK COMPLETED	✓	
8.	Check all straps and readjust as needed. Reassess distal functions in all extremities.	TASK COMPLETED	✓	
9.	On command pick up the patient and long backboard and place it on a stretcher.	TASK COMPLETELY APPROPRIATELY	✓	
10.	Using the straps provided on the stretcher secure the patient and on command lift the stretcher (placing the stretcher in a ready to move state).	TASK COMPLETED	✓	

Instructor: Raymond JontonyInstructor Signature: [Signature]



PepperBall

PEPPERBALL TECHNOLOGIES

User Certification Certificate

This is to certify that

OFFICER RANDY PRITCHETT

Of the
CUYAHOGA COUNTY SHERIFF DEPARTMENT

Has successfully completed the PepperBall Technologies User Certification Course

Instructor: SGT. JOSEPH B. KELLEY

Date: JULY 18, 2013

CUYAHOGA COUNTY SHERIFF'S OFFICE

FILE NO.

DATE

10/20/13

FROM SRT OFC.
SUBJECT POST OPRDERS
COPIES TO AW IVEY

TO SGT. KELLEY

I OFC. Randy Pritchett HAVE READ AND UNDERSTAND THE SRT
POST ORDERS AS WELL AS THE FOLLOWING POLICIES AND PROCEDURES;

Incident Reporting and Investigation

Response to Resistance

Use of Video Recording Equipment/Emergency Response

Use of Video Recording Equipment in Disciplinary Unit

Securing The Property of Inmates in Disciplinary Isolation

Chemical Agents Policy

Cell Extraction

Correction Officers Manual of Instructions and Directions

Randy Pritchett 10/20/13
Sign and Date

PepperBall Technologies, Inc.
©

PepperBall Technologies, Inc.

USER CERTIFICATION

This is to certify that

Randy Pritchett

Of the

Cuyahoga County Sheriff

Has successfully completed a PepperBall Training Course
on 5/3/2011 at the location of Mock Prison Riots

Robert Baldwin

Robert Baldwin, Instructor

Monte Scott

Monte Scott, Director of Training

PepperBall Technologies, Inc.



PepperBall Technologies, Inc.

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This is to certify that

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Has successfully completed a PepperBall Training Course
on 5/3/2011 at the location of Mock Prison Riots

Robert Baldwin

Robert Baldwin, Instructor

Monte Scott

Monte Scott, Director of Training

Expires on 5/3/2013

**THE MONADNOCK PR-24®
CERTIFICATE OF COMPETENCY
PR-24 ADVANCED COURSE**

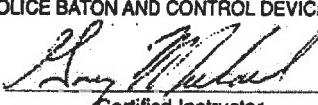
This is to verify that

Randy L. Pritchett

has been properly trained in the uses and concepts of the
MONADNOCK PR-24® POLICE BATON AND CONTROL DEVICES.

No. 2001-02

Date Certified 11/20/01



Certified Instructor

MONADNOCK POLICE TRAINING COUNCIL, INC., FITZWILLIAM, NH 03447

CUYAHOGA COUNTY SHERIFF'S DEPARTMENT

Gerald T. McFaul, Sheriff

This is to Certify that

RANDY PRITCHETT

*Has successfully completed the
Correction Officer Basic 120 Hour Training
compliant with Section 5120: 1-8-18 (D-1,2) of the
Minimum Jail Standards in Ohio
on this day, Friday, May 8, 1998*

Gerald T. McFaul

Gerald T. McFaul
Sheriff, Cuyahoga County

Robert B. Pace

Robert B. Pace
Director of Corrections



CUYAHOGA COUNTY SHERIFF'S OFFICE

A

COMBINATION REPORTFILE # 012043 INCIDENT RESPONSE TO INCIDENT DISCIPLINARY

(PLEASE CHECK OFF THE APPROPRIATE BOXES DESIGNATING THE REPORT TYPE.)

DATE: 12/10/2018 DAY: MONDAY Page: 1 of 1 PagesREPORTING OFFICER: KIMBERLY BROWN-WIGGINSNAME OF PERSONS INVOLVED: 3C8B SULEIMAN, FATIMA SO#0273933 BK# 20181210037
(INCLUDE LAST NAME, FIRST NAME, MIDDLE INITIAL, SO#)

2C1 4T JACKSON, TABITHA SO#0167552 BK# 20181210046

NAME OF PERSON CHARGED: 3C8B SULEIMAN, FATIMA SO#0273933 BK#20181210037
(INCLUDE LAST NAME, FIRST NAME, MIDDLE INITIAL, SO# and BOOKING#)DATE OF INCIDENT: 12/10/2018DAY OF INCIDENT: MONDAYTIME OF INCIDENT: 1500HRSLOCATION OF INCIDENT: MAIN MEDICAL

NARRATIVE: (WHO, WHAT, WHERE, WHEN, WHY, HOW & ACTION TAKEN)

AT ABOUT 1455 HOURS I OFFICER BROWN-WIGGINS WAS ATTEMPTING TO HAVE THE NURSING STAFF DO INTAKE ON THE ELEVEN NEW COMMITT INMATES THAT HAD BEEN WAITING IN THE BULLPIN FOR OVER AND HOUR. AT THIS TIME MTA MCQUEEN RETURNED FROM LUNCH AND BEGAN TO INTAKE THE FEMALES WAITING. AS I SAT BACK DOWN AT THE MEDICAL ESCORT DESK I BEGAN TO HEAR THE NOISE LEVEL IN THE BULLPIN RISE. AS I OFFICER BROWN-WIGGINS WALKED OVER TO THE BULLPIN I OBSERVED INMATE 3C8B SULEIMAN, FATIMA SO#273933 TAKE HER RIGHT HAND AND SLAP INMATE 2C1 4T JACKSON, TABITHA SO#0167552 IN THE FACE. 2C1 JACKSON, T PUT HER HANDS UP TO BLOCK HER FACE AND ATTEMPTED TO MOVE BACK FROM INMATE 3C SULEIMAN, F. INMATE SULEIMAN THEN BALLED HER FIST UP AND HIT INMATE 2C1 JACKSON IN THE FACE AGAIN AS JACKSON WAS ATTEMPTING TO GET AWAY FROM HER. THE BULLPIN DOOR WAS OPEN AND AS MYSELF AND OFFICER MUSZYNEC CAME IN AND ATTEMPTED TO SECURE BOTH INMATES. INMATE 3C SULEIMAN, F CONTINUED TO TRY AND GET INMATE JACKSON. AT THIS TIME INMATE JACKSON GRABBED INMATE SULEIMAN AND STARTED TO HIT HER IN THE FACE. OFFICER DIRECTED JACKSON TO LET GO AND INMATE JACKSON DID SO. INMATE SULEIMAN CONTINUED TO ATTEMPT TO GET PAST ME. ONCE SULEIMAN WAS SECURED IN HANDCUFFS I OFFICER BROWN-WIGGINS THEN SECURED INMATE JACKSON IN HANDCUFFS. AT THIS TIME CPL. PRITCHETT RESPONDED AND TOOK OVER THE SITUATION.



CUYAHOGA COUNTY SHERIFF'S OFFICE

WAS THERE A RESPONSE TO RESISTANCE? NO YESIF YES, NARRATIVE OF RESPONSE USED: Response to Resistance necessary
to secure inmate Jackson's Hands in HandcuffsRESPONSE TO RESISTANCE REVIEWED: 16. d. H. MINOR RULE(S) VIOLATION DISPOSITION REQUESTED (Not to exceed 120 hours)

CHARGES:

 MAJOR / SERIOUS RULE(S) VIOLATION REQUESTED

CHARGES:

2-2 2-19

FLOOR / AREA SUPERVISOR'S REVIEW: Both INMATES were seen in Medical. Inmate Jackson vitals were checked by Nurse Zittel. Returned back to her Housing Unit. Recognized Jackson previously in lockup 2C1#4T. Inmate Subman was seen by DR. Francis and was ordered by DR. Francis to send inmate to Metro by EMS due to facial injuries. EMS Mid. Deputy Calvert Deputies Brown & Vezza TCSF was placed on administrative request for discipline, if applicable, has been reviewed & forwarded to the SGT for further action?

 YES NO

ALL SEGMENTS OF THIS REPORT ARE COMPLETE?

 YES NOCpl Rob Reiter
(FLOOR / AREA SUPERVISOR'S SIGNATURE) MINOR RULE VIOLATION DISPOSITION APPROVED: YES NO

DISCIPLINARY ISOLATION START: @

AM PM

END: @

AM PM

 REQUEST FOR MAJOR / SERIOUS DISCIPLINE HAS BEEN REVIEWED & APPROVED FOR FURTHER INVESTIGATION AND APPROPRIATE ADMINISTRATIVE ACTION? YES NOREPORT REVIEWED AND APPROVED: YES NO

SERGEANT'S REVIEW:

both inmates held in 1-3-12
lock up for fighting except for the [initials]

SERGEANT'S SIGNATURE:

DATE:

2.

EXHIBIT

tabbed

2

County 0001653

Jackson v. Cuyahoga County, et al. (1:20-cv-02649)



CUYAHOGA COUNTY SHERIFF'S OFFICE
Clifford Pinkney, Sheriff

A

COMBINATION REPORT

FILE # 112044 INCIDENT RESPONSE TO INCIDENT DISCIPLINARY

PLEASE CHECK OFF THE APPROPRIATE BOXES DESIGNATING THE REPORT TYPE

DATE: 12-10-18 DAY: Monday Page: 2 of 4 PagesREPORTING OFFICER: Mrs. Diane Nancy SIGNATURE Diane 20181210027NAME OF PERSONS INVOLVED: 3C8B Sullivan Fatima 27393 - 2C1-4T Jackson
(INCLUDE LAST NAME, FIRST NAME, MIDDLE INITIAL, SO#)Tabitha 167552 - BK# 20181026046 2C1-4T2C1-4T JACKSON TABITHA 167552 20181026046NAME OF PERSON CHARGED: 3C8B Sullivan Fatima 27393 20181210037
(INCLUDE LAST NAME, FIRST NAME, MIDDLE INITIAL, SO# and BOOKING#) 2C1-4T 10DATE OF INCIDENT: 12-10-18DAY OF INCIDENT: MondayTIME OF INCIDENT: 1600 HrsLOCATION OF INCIDENT: Main Hospital

NARRATIVE: (WHO, WHAT, WHERE, WHEN, WHY, HOW & ACTION TAKEN)

December 10-2018 at 1600hrs, I assisted Officer Brown Wiggins with a altercation between 3C8B Sullivan Fatima 27393 and 2C1-4T Jackson Tabitha 167552 and placed handcuffs on Diane Jackson Tabitha 167552 after the altercation was under control.

I.

EXHIBIT

tabbed

3

County 0001654

Jackson v. Cuyahoga County, et al. (1:20-cv-02649)



CUYAHOGA COUNTY SHERIFF'S OFFICE
Clifford Pinkney, Sheriff

WAS THERE A RESPONSE TO RESISTANCE? NO YES

IF YES, NARRATIVE OF RESPONSE USED: Response to Resistance necessary

to secure inmate SC3B SULEMAN FATHI # 273923-20181010087

RESPONSE TO RESISTANCE REVIEWED: CT. J. H.

MINOR RULE(S) VIOLATION DISPOSITION REQUESTED (Not to exceed 120 hours)

CHARGES:

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MAJOR / SERIOUS RULE(S) VIOLATION REQUESTED

CHARGES: 2-2 2-19

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FLOOR / AREA SUPERVISOR'S REVIEW:

Response to Resistance Report.

REQUEST FOR DISCIPLINE, IF APPLICABLE, HAS BEEN REVIEWED & FORWARDED TO THE SGT FOR FURTHER ACTION?

YES NO

ALL SEGMENTS OF THIS REPORT ARE COMPLETE?

YES NO

Cpl. R. Johnson
(FLOOR / AREA SUPERVISOR'S SIGNATURE)

MINOR RULE VIOLATION DISPOSITION APPROVED: YES NO

DISCIPLINARY ISOLATION START: _____ @ _____ AM PM

END: _____ @ _____ AM PM

REQUEST FOR MAJOR / SERIOUS DISCIPLINE HAS BEEN REVIEWED & APPROVED FOR FURTHER INVESTIGATION AND APPROPRIATE ADMINISTRATIVE ACTION? YES NO

REPORT REVIEWED AND APPROVED: YES NO

SERGEANT'S REVIEW: See Report # 013043

SERGEANT'S SIGNATURE: CT. J. H.

DATE: 12/10/18

3.

EXHIBIT

tabler

3